EXHIBIT C

Elizabeth Kavaler, M.D.

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1
          UNITED STATES DISTRICT COURT
       SOUTHERN DISTRICT OF WEST VIRGINIA
2
               CHARLESTON DIVISION
3
    IN RE: ETHICON, INC., :Master File No.
    PELVIC REPAIR SYSTEMS :2:12-MD-02327
    PRODUCTS LIABILITY
                            :MDL 2327
5
    LITIGATION
                            :JOSEPH R. GOODWIN
                             :U.S. DISTRICT JUDGE
6
    JO HUSKEY AND ALLEN
    HUSKEY
7
                             :Case No. 2:12-cv-05201
           vs.
    ETHICON, INC., et al.
8
           and
9
    TONYA AND GARY EDWARDS :
                            :Case No. 2:12-cv-09972
           vs.
10
    ETHICON, INC., et al. :
11
12
                  APRIL 8, 2014
13
           Oral deposition of ELIZABETH
14
    KAVALER, M.D., taken pursuant to notice,
    was held at the law offices of Riker,
15
16
    Danzig, Scherer, Hyland & Perretti, LLP,
    500 Fifth Avenue, New York, New York 10110,
17
    commencing at 8:20 a.m., on the above date,
18
19
    before Amanda Dee Maslynsky-Miller, a
20
    Certified Realtime Reporter and Notary
21
    Public in and for the State of New York.
22
            GOLKOW TECHNOLOGIES, INC.
         877.370.3377 ph 917.591.5672 fax
23
                deps@golkow.com
24
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Elizabeth Kavaler, M.D.

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1
                  "Question: And will you
2
           agree with me that a medical
           device manufacturer has the
           obligation to research the safety
           of its products before putting
6
           them on the market?")
7
8
                  MS. FITZPATRICK: You can go
9
           ahead and answer.
10
                  Unless he tells you
11
            specifically not to answer the
12
           question, you can go ahead and
13
            answer.
14
                  THE WITNESS: I have no
15
           opinion on that.
16
    BY MS. FITZPATRICK:
17
            Ο.
              Do you, as a physician who
    treats women, rely on information
18
19
    provided to you by medical device
    manufacturers concerning the safety of
20
21
    their product?
22
                  Not specifically. I rely on
            Α.
23
    many things.
24
                  Do you rely at all on what
            Ο.
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